

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

STEPHEN McCOLLUM, and SANDRA	§	
McCOLLUM, individually, and STEPHANIE	§	
KINGREY, individually and as independent	§	
administrator of the Estate of LARRY GENE	§	
McCOLLUM,	§	
PLAINTIFFS	§	
	§	
v.	§	CIVIL ACTION NO.
	§	4:14-cv-3253
	§	JURY DEMAND
BRAD LIVINGSTON, JEFF PRINGLE,	§	
RICHARD CLARK, KAREN TATE,	§	
SANDREA SANDERS, ROBERT EASON, the	§	
UNIVERSITY OF TEXAS MEDICAL	§	
BRANCH and the TEXAS DEPARTMENT OF	§	
CRIMINAL JUSTICE.	§	
DEFENDANTS	§	

**PLAINTIFFS' OPPOSED MOTION TO FILE UNDER SEAL**

Plaintiffs move to seal Exhibits 303-321 of Plaintiff's Response to Defendants' Motion for Summary Judgment (Doc. 285 and Doc. 288). The exhibits are autopsy reports, death investigations, and interior photographs of the Hutchins Unit designated by Defendants as "Attorneys Eyes Only," pursuant to the Court's Protective Order. While it is Plaintiffs' position that these exhibits should be publicly available, as they are of important interest to the public, presently these exhibits have been designated as containing "Classified Information" as defined by the Protective Order and should thus be filed under seal.

For the forgoing reasons, Plaintiffs move to seal Exhibits 303-321 of Plaintiff's Appendix to Plaintiffs' Response to Defendants' Motion for Summary Judgment.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

I corresponded by email with counsel for the Defendants regarding this issue, and did not receive a response. UTMB is unopposed to filing some, but not all, of these exhibits under seal. UTMB is not opposed to filing the “final” autopsies of William Roberts and Adam Swanson under seal, but is opposed to filing the “provisional” autopsies and other related documents under seal. TDCJ’s counsel defers to UTMB’s counsel regarding these documents. Therefore, Defendants are opposed to the relief requested.

/s/ Scott Medlock  
Scott Medlock

CERTIFICATE OF SERVICE

By my signature above, I certify that a true and correct copy of the foregoing has been served on all counsel of record on September 7, 2016 through the Electronic Case File System of the Southern District of Texas.

/s/ Jeff Edwards  
JEFF EDWARDS